

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **Smarr Energy Facility**

City: Smarr

County: Monroe

AIRS #: 04-13-207-00030

Application #: 615251

Date Title V Application Received: March 28, 2022

Permit No: 4911-207-0030-V-08-2

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Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the proposed permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Existing Permits**

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Description
4911-207-0030-V-08-0	June 13, 2017	Title V Renewal

B. Regulatory Status**1. PSD/NSR/RACT**

The Smarr Energy Facility is considered as a minor source with respect to PSD regulations which in 40 CFR 52.21(b)(1) defines a major stationary source as one that has the potential to emit 250 tons per year or more of any regulated NSR pollutant. The Facility is located in Monroe County which is considered a non-attainment area for ozone and an attainment area for all other criteria pollutants. Please note the facility is not classified as one of the 28 named source categories.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	yes	✓		
PM ₁₀	yes	✓		
PM _{2.5}	yes	✓		
SO ₂	yes			✓
VOC	yes			✓
NO _x	yes	✓		
CO	yes	✓		
TRS	n/a			
H ₂ S	n/a			
Individual HAP	yes			✓
Total HAPs	yes			✓

II. Proposed Modification

A. Description of Modification

Smarr Energy Facility is currently permitted to operate two natural gas-fired simple-cycle combustion turbines (Unit IDs: T001 and T002), a natural gas-fired fuel heater (Unit ID: H001), and a diesel-fired emergency generator engine (Unit ID: GEN1) under Permit No. 4911-207-0030-V-08-0.

On December 18, 2020, Smarr Energy Facility submitted a request for an off-permit modification (Application No. 27813) to the Division to perform a replacement of the 10.8 MMBtu/hr natural gas fired fuel heater (Unit ID: H001). The new heater kept the same unit ID and functions in the same role at the site as the previous heater. The previous heater was installed in 1999 with a rated heat input capacity of 10.8 million British thermal units per hour and replaced on March 5, 2022 with a 6.0 MMBtu/hr natural gas fired heater.

As a result of the heater replacement, some conditions in the permit are no longer applicable due to changes in the regulatory applicability for the heater. The old heater was subject to the requirements of the federal New Source Performance Standard (NSPS) in 40 CFR 60 Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, since the heater had a heat input capacity greater than 10 MMBtu/hr and was installed after June 9, 1989. The replacement heater has a rated heat input capacity of less than 10 MMBtu/hr, therefore it is not subject to NSPS Subpart Dc and all conditions referencing NSPS will be removed via the modification covered under Application No. 615251.

B. Emissions Change

As a result of the replacement of the previous 10.8 MMBtu/hr heater with a 6.0 MMBtu/hr heater, the facility's emissions have decreased.

Table 3: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	y	(0.18)	(0.18)
PM ₁₀	y	(0.18)	(0.18)
PM _{2.5}	y	(0.18)	(0.18)
SO ₂	y	(0.01)	(0.01)
VOC	y	(0.12)	(0.12)
NO _x	y	(3.72)	(3.72)
CO	y	(1.10)	(1.10)
TRS	n		
H ₂ S	n		
Individual HAP	y	(3.26x10 ⁻³)	(3.26x10 ⁻³)
Total HAPs	y	(3.57x10 ⁻³)	(3.57x10 ⁻³)

C. PSD/NSR Applicability

This modification is not subject to PSD or NSR regulations and is not a modification under NSPS or NESHAP.

III. Facility Wide Requirements

A. Emission and Operating Caps

There are no new or modified emission and operating caps associated with this modification.

B. Applicable Rules and Regulations

There are no new applicable rules and regulations associated with this modification.

C. Compliance Status

The facility is in compliance with all applicable Federal and State air regulations and permit conditions.

D. Permit Conditions

There are no new permit conditions associated with this modification.

IV. Regulated Equipment Requirements

A. Brief Process Description

A brief process description is specified in the narrative for Title V Permit No. 4911-207-0030-V-08-0.

B. Modified Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
T001	Combustion Turbine	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(nnn) 40 CFR 60 Subpart A 40 CFR 60 Subpart GG Acid Rain, CSAPR**	DLN1	Dry Low NOx Burner
T002	Combustion Turbine	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(nnn) 40 CFR 60 Subpart A 40 CFR 60 Subpart GG Acid Rain, CSAPR**	DLN2	Dry Low NOx Burner
H001	6.0 MMBtu/hr Heater	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None
GEN1	Emergency Generator, 500 KW	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(mmm) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

** CSAPR = Cross State Air Pollution Rule (i.e., 40 CFR 97)

C. Equipment & Rule Applicability

- Emission and Operating Caps – There are no new or modified emission and operating caps associated with this modification.
- Applicable Rules and Regulations - There are no new applicable rules and regulations associated with this modification.

D. Permit Conditions

Condition 3.3.6 has been removed from the permit because the heater is no longer subject to 40 CFR 60 Subpart Dc and 40 CFR 60 Subpart A.

Condition 3.4.3 has been modified to update the particulate matter limit under Georgia Rule (d) for replacement heater H001.

V. Testing Requirements (with Associated Record Keeping and Reporting)

Not applicable.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

Condition 5.2.3 has been modified to remove the natural gas monthly monitoring requirement for previous heater H001.

VII. Other Record Keeping and Reporting Requirements

Condition 6.2.1 has been modified to remove the record retention requirement for previous heater H001 because it is no longer subject to 40 CFR 60.48c(g)(2).

Addendum to Narrative

The 45-day EPA review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//